

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FT. LAUDERDALE DIVISION

ADVOCATES FOR THE DISABLED,
INC., PETER SPALLUTO and
ERNST ROSENKRANTZ,

CASE NO: 00-6025-CIV
JUDGE: MIDDLEBROOKS
MAGISTRATE: BANDSTRA

Plaintiffs,

vs.

SEA CASTLE RESORT MOTEL
PARTNERSHIP and MICHELLE
BROWNELL,

Defendants.

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DEFENDANT, SEA CASTLE RESORT MOTEL PARTNERSHIP'S
AGREED MOTION FOR TWENTY (20) DAY EXTENSION OF
TIME WITHIN WHICH TO RESPOND TO AMENDED COMPLAINT,
TO RESPOND TO PLAINTIFFS' REQUEST FOR ADMISSIONS,
TO RESPOND TO PLAINTIFFS' REQUEST FOR PRODUCTION
AND TO RESPOND TO PLAINTIFFS' INTERROGATORIES

COMES NOW THE Defendant, SEA CASTLE RESORT MOTEL PARTNERSHIP ("SEA
CASTLE"), by and through its undersigned attorneys and makes this its
Motion for Twenty (20) Day Extension of Time Within Which to Respond to
Amended Complaint, to Respond to Plaintiffs' Request for Admissions, to
Respond to Plaintiffs' Request for Production and to Respond to
Plaintiffs' Interrogatories and in furtherance thereof would state as
follows:

1. That Defendant, SEA CASTLE, was the former owner of the property
which is the subject matter of this action.

2. That Defendant has advised Plaintiffs' counsel that it no longer owns, leases, leases to or operates the subject claimed place of public accommodation as alleged within Plaintiffs' Amended Complaint.

3. That Defendant has contacted counsel for Plaintiffs and provided it with certain documentation establishing this Defendant's lack of involvement with the subject property, however Plaintiffs' counsel is in need of additional time within which to review those materials.

4. That SEA CASTLE is in need of an extension of time from the dates that its responses to Plaintiffs' Amended Complaint, Plaintiffs' Request for Admissions, Plaintiffs' Request for Production and Plaintiffs' Interrogatory questions are due.

5. That undersigned counsel has contacted counsel of record for Plaintiffs who is in agreement with the granting of this extension of time.

6. That this Motion is not interposed for purposes of delay and is made in good faith.

WHEREFORE Defendant, SEA CASTLE RESORT MOTEL PARTNERSHIP, moves this Honorable Court to enter an Order extending the period of time within which it must respond to Plaintiffs' Amended Complaint, Plaintiffs' Request for Admissions, Plaintiffs' Request for Production and Plaintiffs' Interrogatory questions by twenty (20) days.

I HEREBY CERTIFY that a copy of the foregoing was furnished via U.S.

Mail on this 30th day of May, 2000 to: Lawrence W. Fuller, Esquire, Fuller, Mallah & Associates, P.A., 111 Lincoln Road, PH 802, Miami Beach, Florida 33139.

Kelley, Herman & Smith
Attorneys for Sea Castle
1401 East Broward Blvd.
Suite 206
Ft. Lauderdale, Florida 33301
(954) 462-7806



JEFFREY B. SMITH
Florida Bar No: 356050